

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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Appellants:	Rodrigues, Northon et al.	Examiner:	A. Ho
Serial No.	10/527,576	Group Art Unit:	2194
Filed:	March 11, 2005	Docket No.	PU020393
Title:	ASSOCIATING NOTIFICATIONS OF THE STATUS OF A DATA NETWORK BY MEANS OF A TOPOLOGY EDITOR		
Customer No:	24498		

APPELLANTS' BRIEF

MAIL STOP: APPEAL BRIEF - PATENTS
Commissioner for Patents
Post Office Box 1450
Alexandria, Virginia 22313-1450

Sir:

This brief is in furtherance of the Notice of Appeal in this case, timely filed on January 21, 2009. Appellants hereby appeal to the Board from the decision of the Examiner in the Office Action mailed on September 18, 2008 finally rejecting the pending claims 1, 3, 5 – 8 and 10 - 14. Accordingly; those claims are now on appeal.

Applicants request a two-month (2) extension under 37 C.F.R. 1.136(a) to submit this Brief.

Please charge Deposit Account 07-0832, for any fees owed for the submission of this Appellants' Brief and for the requested Extension of Time.

Appellants do not request an oral hearing.

I. REAL PARTY IN INTEREST

The real party in interest in this appeal is Thomson Licensing Inc., the assignee of record.

II. RELATED APPEALS AND INTERFERENCES

There are no appeals or interferences that will directly affect, or be directly affected by, or have a bearing on the Board's decision in this appeal.

III. STATUS OF CLAIMS

The status of all of the claims remaining in the application, claims 1, 3, 5 – 8 and 10 - 14, is set forth in Appendix A of this Brief.

Claims 2, 4 and 7 - 9 have been canceled.

Claims 15 and 16 have been withdrawn.

Claims 1, 5 – 8 and 11 - 13 have been rejected under 35 U.S.C. 102(a) as anticipated by Angal (US Patent No 6298378, hereafter referred to as “Angal”).

Claims 3, 10 and 14 have been rejected under 35 U.S.C. 103(a) as unpatentable over Angal in view of Vining (US Patent No. 7152075, hereafter referred to as “Vining”).

IV. STATUS OF AMENDMENTS

All amendments prior to this Appeal have been entered.

V. SUMMARY OF CLAIMED SUBJECT MATTER

CLAIM 1

The invention of claim 1 relates to a method using a topology editor for

identifying devices 10 - 40 operating on a data network 100 to be notified in response to events related to the operation and status of the devices on the network (description, page 2, line 2 – 3, Figs. 5 & 6); that is, a method for “setting up” a system for assigning events pertaining to operation of devices on a network using a topology editor.

The claim language “topology editor” is described in the present application as follows:

“A topology editor is a user-controlled interface that is used to establish functional relationships between devices on a data network --- this relationship is established through the use of graphic elements” (description, page 4, line 6 – 10; see also Fig. 2, console 205 and related description beginning at page 6, line 9).

The description of the method of claim 1 whereby relationships among devices on a network are set up using a topology editor (console 205) begins at page 11, line 27 of the specification, referring to Fig. 5 as follows:

“Rule definition process 500 begins with the definition (i.e., the claimed step of “defining”) of an event pertaining to the operation of a network or devices on the network in step 510. -----the event is assigned a definition by use of a user interface ---- generated by console 205, etc.”;

“In step 520, the user interface is used to assign a device” (or group of devices) “to a particular event” (page 11, line 35);

“A rule is assigned to a selected event in step 530. This step is also enabled by a user operating a user interface” (page 12, line 6);

“A rule associated with an event is activated in step 540 upon the

matching of a predefined condition or set of predefined conditions” (page 12, line 13);

-----“If the message matches the conditions for a particular rule step 550 is activated where the device or devices associated with the event, as an event group, are transmitted an action notification in accordance with the conditions defined by the activated rule” (page 12, line 16). (Emphasis added; see also specification, page 6, lines 9 – 17; page 7, line 34 – page 8, line 5).

All elements of claim 1 are thus described in the quoted parts of the specification as claimed.

CLAIM 8

Independent claim 8 relates to “A method for using a topology editor to notify a group of devices in response to an event related to the operation of a data network” (emphasis added).

As is shown in Fig. 5 and described beginning at page 11, line 35 of the specification, in step 520 of the disclosed method, a device is assigned to an event by use of a graphical user interface (i.e., a “topology editor” – see above).

“Once the graphic representation of a device is dropped into the folder, the selected device will be notified of any actions that are related to the event when a rule is activated” (page 11, last line – page 12, line 2).

The remaining elements of Claim 8 and the corresponding support in the specification appear as follows:

“receiving a notification relating to the operation of the data network ---“;
(see specification, page 11, lines 5 – 11) “notification manager monitors

traffic on network 100 ---- Once a message is received notification manager 210 forwards the substance of the message to action manager 215 ---“;

“comparing said notification to a condition of a rule”;

(see specification, page 11, lines 12 – 17) “Action manager 215 then compares the substance of the received message to the rules ----- . If the received status message matches conditions defined for one of the rules, action manager 215 prepares an action notification associated with the matching rule”;

“notifying a defined group of devices in response to said event with an action provider ---“.

(see specification, page 11, lines 17 – 19) “If the conditions of a rule are matched, action manager 215 communicates the action notification to action provider 230 for dissemination to network devices, as defined by the event group related to the matching rule”.

Such operations are also described beginning at page 12, line 14 as follows:

“Preferably, action manager 215 compares a received system message to a set of rules, as stored in repository 220. If the message matches the conditions for a particular rule, step 550 is activated where the device or devices associated with the event, as an event group, are transmitted an action notification in accordance with the conditions defined by the activated rule. The notification is transmitted ----- over a data network by action provider 230 –“.

Finally, claim 8 recites:

“wherein notification of said defined group of devices in response to said event is defined by use of said topology editor”.

This feature is described at page 11, line 35 – page 12, line 5 which concludes:

“Step 525 allows a user to modify an event associated with a device by using a user-controlled interface” (the topology editor). “This operation allows more devices to be associated with an event ---“.

In addition, page 10, lines 22 and following provide:

“---the options selected via console 205” (the topology editor) “controls the operation of action manager 215 that integrates the set up, communication and routing of messages through a network”.

Thus, all elements of claim 8 are disclosed in the specification as claimed.

VI. GROUND OF REJECTION TO BE REVIEWED ON APPEAL

A. Claims 1, 5 – 8 and 11-13 have been rejected under 35 U.S.C. § 102(a) as being anticipated by Angal.

B. Claims 3, 10 and 14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Angal in view of Vining.

VII. ARGUMENT

REJECTION OF CLAIMS 1, 5 – 8 and 11 - 13 UNDER 35 U.S.C. § 102(a)

In order to anticipate a claim under 35 U.S.C. § 102 (a), it is required that “the (entire) invention” (that is, all elements) must be described in the cited reference. This principal of “anticipation” as decided in various CAFC decisions are set forth in MPEP §2131 as follows:

“Thus, in order to anticipate a claim, the reference must teach every element of the claim. That is,

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. V. Union Oil Co. of California*, 814 F2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

“The identical invention must be shown in as complete detail as is contained in the ----claim.” *Richardson v. Suzuki Motor Co.*, 868 F2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

“The elements must be arranged as required by the claim ---“, *In re Bond*, 910 F2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).”

THE PRINCIPAL CITED REFERENCE

The principal reference, Angal, does not disclose “every element” of the independent claims 1 and 8 and, furthermore, the elements of the reference are not “arranged as required by the claim(s)”. The Angal reference therefore does not anticipate the claims, whereby the Examiner has not established a prima facie case of anticipation under 35 U.S.C. 102(a).

Angal describes an event distribution system for computer network management architecture. A technique is described for reporting events raised by entities running on computer networks. When an event is generated from an event source, and received by an event distribution system, the event distribution system processes and forwards the event, or a notification of the event, to an appropriate listener (see Abstract).

In the Final Rejection, the Examiner relies repeatedly on lines 4 – 30, col. 4 of Angal for anticipation of the elements of claims 1 and 8 (as well as each of the claims 3, 5, 10, 11, 13 and 14 in which a “topology editor” is specifically recited). However, the Examiner never identifies any particular language in the twenty-seven cited lines of text of column 4 which corresponds to elements of claim 1 or claim 8.

The cited text in Angal reads as follows:

“Between the Application and Hardware layers is the Platform layer. This layer comprises network management software designed to allow the network administrator operating an application such as UI 102 access to entities and devices on the network. The network management software also operates to enable communications among various entities installed on the network, including event communications. In one embodiment, the network communications are handled by a central Management Information Server (“MIS”) 104 that coordinates messages sent between entities running on each of the network layers. MIS 104 interacts with a Name Server 106 that provides a database comprising names and addresses for all entities installed on the network. An example of one such Name Server can be found in co-pending U.S. patent application Ser. No. 09/305,323 filed on even date herewith and which is incorporated herein by reference for all purposes. A Topology Service 112 and a Logging/Alarm Service 114 provide resources for managing network entities and alarms. Examples of these services can be found in co-pending U.S. patent application Ser. Nos. 09/205,826 and 09/205,911, each of which is incorporated herein by reference for all purposes. The platform level entities further include an Agent 118 and a Message Protocol Adapter (“MPA”) 116 that allow communication between Device 120 and MIS 104. One example of an MPA can be found in co-pending U.S. patent application Ser. Nos. 09/205,078 and 09/205,325”.

In this extensive passage from Angal, contrary to the Examiner's position, Angal does not disclose "a topology editor" as required by rejected claim 1 (line 1 - "A method for using a topology editor to prescribe a device notified"; line 7 - "assigning a group ---of devices --- to be notified --- by use of said topology editor") or rejected claim 8 (line 1 - "A method for using a topology editor to notify a group of devices --- "; line 8 - " notifying a defined group of devices--- wherein notification --- is defined by use of said topology editor.").

Angal's references to a "topology service" (Fig. 1, Topology Service 112, col. 4, line 20) and a "Topology Server" (col. 4, line 31) appear to be two names for a single element in Angal's system. However, it is submitted that this element is not a "topology editor" that is used to provide the method steps as required by the language of rejected claims 1 and 8.

In order to avoid ambiguities, Angal's device will be referred to hereinafter as a "topology service". As shown in Fig. 1, "topology service" 112 is not part of or even connected to Angal's "User Interface" 102. Furthermore, Angal does not describe his topology service as either "assigning a group ---of devices --- to be notified --- by use of said topology editor" (claim 1) or as "A method for using a topology editor to notify a group of devices --- "; (claim 8) or as "notifying a defined group of devices--- wherein notification --- is defined by use of said topology editor." (claim 8).

Angal describes a significantly different event distribution system than that which is presently claimed. For example, at col. 5, beginning at line 42, Angal describes his Fig. 4 which illustrates "an event filter for use by the MIS" (Management Information Server). In Fig. 4, Angal shows a table

having two columns, one column labeled “Filter” and the other labeled “Subscriber”. In that table, “there is a one-to-one correspondence between Filters and Subscribers” (col. 5, line 48). As Angal states at col. 5, beginning at line 34, “---the MIS receives the event---”, “---the event is processed using a filter ---“, “---if there is a match---“ at the filter “---the event is sent to a listener---“.

There are no elements in Angal’s description of his topology service 112 that correspond to the language quoted above from claims 1 and 8. Angal’s method of processing events is quite different from that which is claimed in either claim 1 or claim 8. The elements are different and their arrangement and method of operation is different as well. Another example of how topology service 112 is not the topology editor claimed in the rejected claims can be found at column 6, lines 50 – 53 where Topology Server 112 is identified as a “listener” or recipient of event information; that is, neither “assigning a group ---of devices --- to be notified --- by use of said topology editor” (claim 1) nor “A method for using a topology editor to notify a group of devices --- “; (claim 8) nor “notifying a defined group of devices--- wherein notification --- is defined by use of said topology editor.” (claim 8).

In the Final Rejection (paragraph 5), the Examiner asserts that “Angal ---- teaches the use of a topology service 112 together with a user interface 102 to prescribe a device notified in response to an event” . However, this conclusion ignores the steps of claim 1 (“assigning a group --- of devices---to be notified— by use of said topology editor“) and claim 8 (“notifying a defined group of devices --- wherein notification --- is defined by use of said topology editor”)

which are not disclosed by Angal in connection with either his topology service or his user interface. In fact, Angal does not disclose any particular why in which there is an interaction of this type between his two devices.

It is therefore respectfully submitted that anticipation of independent claims 1 and 8 by Angal has not been demonstrated. Withdrawal of the rejection based on anticipation of each of independent claim 1 (and claims 5 – 7 dependent thereon) and independent claim 8 (and claims 11 – 13 dependent thereon) and allowance thereof are therefore respectfully requested.

REJECTION OF CLAIMS 3, 10 and 14 UNDER U.S.C. § 103(a)

A. In the case of the Final Rejection of claims 3, 10 and 14 under 35 U.S.C. § 103(a), as being obvious in view of a combination of elements of Angal in view of Vining, it is respectfully submitted that no prima facie case of obviousness has been made out by the Examiner based on that combination of references.

1. GENERAL STATEMENT OF PROPER BASIS FOR REJECTIONS UNDER 35 U.S.C. § 103(a)

In a “Notice” dated October 3, 2007, the Director of the USPTO promulgated “Examination Guidelines For Determining Obviousness Under 35 USC 103 in View of the Supreme Court Decision in *KSR International Co. v. Teleflex, Inc.*”, 550 U.S. ____, 127 S. Ct. 1727, 82 USPQ2d 1385, decided April 30, 2007 .

In the “Guidelines”, the Director stated:

“As reiterated by the Supreme Court in *KSR*, the framework for the objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.* Obviousness is a question of law based on underlying factual inquiries. The factual inquiries enunciated by the Court are as follows:

- (1) Determining the scope and content of the prior art;
- (2) Ascertaining the differences between the claimed invention and the prior art;
- and
- (3) Resolving the level of ordinary skill in the pertinent art.”

The “Guidelines” go on to provide specific “rationales” for supporting a legal conclusion of obviousness based on combinations of references as follows (emphasis added):

“The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit. (emphasis added). The Court quoting *In re Kahn*, [citation omitted] stated that ‘[R]ejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness’.

Rationales

(A) Combining prior art elements according to known methods to yield predictable results;

(B) Simple substitution of one known element for another to obtain predictable results;

(C) Use of known technique to improve similar devices (methods, or products) in the same way;

(D) Applying a known technique to a known device (method, or product) ready for improvement to yield predictable results;

(E) “Obvious to try” – choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success;

(F) Known work in one field of endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations would have been predictable to one of ordinary skill in the art;

(G) Some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.” .

The “Guidelines” go on to recognize the continued viability of the TSM rationale (item “G”) as follows:

“If the search of the prior art and the resolution of the Graham factual inquiries reveal that an obviousness rejection may be made using the familiar teaching-suggestion-motivation (TSM) rationale, then such a rejection using the TSM rationale can still be made. Although the Supreme Court in *KSR* cautioned against an overly rigid application of TSM, it also recognized that TSM was one of a number of valid rationales that could be used to determine obviousness”.

In *KSR International Co. v. Teleflex, Inc. et al.*, *supra*, (see Section “B”, pages 14 – 15 of the published decision), the U. S. Supreme Court discussed this requirement of “teaching, suggestion or motivation” and stated:

“When it first established the requirement of demonstrating a teaching, suggestion or motivation to combine known elements in order to show that the combination is obvious, the Court of Customs and Patent Appeals captured a helpful insight. See *Application of Bergel*, 292 F. 2d 955, 956 – 957 (1961). ----- In the years since the Court of Customs and Patent Appeals set forth the essence of the TSM test, the Court of Appeals no doubt has applied the test in accord with these principles in many cases. There is no necessary inconsistency between the idea underlying the TSM test and the Graham analysis”.

The “Graham analysis” refers to the three required factual inquiries set out in *Graham v. John Deere Co. of Kansas City*, 383 U. S. 1 (1966) mentioned above.

It is therefore respectfully submitted that under the published guidelines incorporating the latest Supreme Court decision (the *KSR* case) the Examiner is required to find all elements of the claims in citable references or sources, to identify all missing elements (“ascertain— the differences”); to find such references which teach, suggest and/or motivate the person of ordinary skill to combine such elements in the manner set forth in the rejected claims, and provide a “clear articulation of the reason(s) why the claimed invention would have been obvious” (*KSR supra*, emphasis added) . The *KSR* opinion requires that “rejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness”. In the absence of references disclosing all of the claimed elements, and the showing of a teaching, suggestion or motivation to combine such claimed elements in the manner claimed, and a

clear statement and rational analysis of its basis, an obviousness rejection cannot stand.

To summarize, in order to establish a prima facie case of obviousness, all of the foregoing basic criteria must be met. That is, the prior art references when combined must teach or suggest all of the claim limitations. There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine them as claimed. Finally, there must be a reasonable expectation of success for the proposed combination of elements. The teaching or suggestion to make the claimed invention and the reasonable expectation of success must both be found in the prior art, and not based on the applicant's own disclosure. *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Patent examiners cannot rely on their own knowledge as a basis for rejecting patent applications without the citation of specific evidence (references) having a teaching, suggestion or motivation to modify a reference or to combine two or more references ; *In re Lee*, 277 F.3d 1338, 1345 (Fed. Cir. 2002).

The examiner bears the burden of establishing a prima facie case of obviousness and “can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references.” *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988, emphasis added).

Absent the elements or the showing of a teaching, suggestion or motivation to combine such elements as claimed, an obviousness rejection cannot stand.

2. THE DISCLOSURE IN U.S. PATENT NO. 7,152,075 - VINING

Vining describes a system and method for removing old “rules” from a data administration system. When a new rule is entered into a system which contains existing rules, parameters of the existing rules are compared to the new rules to determine if any parameters of new rules encompass parameters of existing rules. If so, the existing rule is removed (see Abstract).

Vining is concerned with and dependent on rules having associated time stamps which makes it possible to detect which rules arrived later in time. Vining is silent on the nature or use of a “topology editor” in any context.

Rejected dependent claim 3, which is dependent on claim 1, is submitted to be patentable for the same reasons as were presented above in distinguishing independent claim 1 over Angal. Specifically, Vining, like Angal, neither discloses nor suggests “assigning a group consisting of a plurality of devices of said data network to be notified in response to said event by use of said topology editor” as recited in appealed claim 1. Vining is silent regarding assigning anything by using a topology editor. It is therefore respectfully submitted that there is no possible combination of Vining with Angal which can be said to disclose, teach, suggest to or motivate a person of ordinary skill to combine these two references to arrive at the step of “assigning a group consisting of a plurality

of devices of said data network to be notified in response to said event by use of said topology editor” as recited in appealed claims 1 and 3.

Rejected dependent claims 10 and 14, which are dependent on claim 8, are submitted to be patentable for the same reasons as were presented above in distinguishing independent claim 8 over Angal. Specifically, Vining, like Angal, neither discloses nor suggests “A method for using a topology editor to notify a group of devices --- “ or “notifying a defined group of devices--- wherein notification --- is defined by use of said topology editor” as required by appealed claim 8. Vining is silent regarding notifying anything by using a topology editor. t

Because of the significant differences between Appellant’s claimed invention and the method/system disclosed by either of Angal or Vining, those references do not provide any teaching, suggestion or motivation for modifying either reference in order to arrive at Appellants’ claimed methods of notifying events in a network system.

The Examiner has attempted to bridge the gap between Angal and the rejected claims by using Appellants’ disclosure as a roadmap to find an unrelated second reference (Vining). The Examiner then goes on to attempt to modify Angal by combining its disclosure with unrelated elements of Vining. However, as shown above, the gap between the claims and what the references disclose has not been closed and there is no combination of these two references which meets the appealed claims or renders the appealed claims obvious.

Appellants therefore assert that claims 3, 10 and 14 are patentable, as such claims depend on allowable claims 1 or 8, as the case may be. Appellants request the reversal of the rejection of all claims.

VIII. CLAIMS APPENDIX

A complete listing of the claims involved in this appeal is attached hereto as Appendix A.

IX. EVIDENCE APPENDIX

Appellant does not submit any additional evidence and, therefore, an Appendix B is hereby attached indicating "none."

X. RELATED PROCEEDINGS APPENDIX

Appellant states that there are no relevant related proceedings and, an Appendix C is hereby attached indicating "none."

XI. CONCLUSION

The Examiner has not shown in the cited prior art where one may find support for rejections of the pending claims on Appeal. There is simply no disclosure/support pointed out by the Examiner that is even relevant to the features positively recited in claims 1, 3, 5 – 8, and 10 – 14. Appellants submit that the rejections are traversed and overcome, in light of the arguments presented above.

The allowance of all claims on Appeal is therefore respectfully requested.

Respectfully submitted,

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Date: May 21, 2009

Patent Operations

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Attachments:

Appendix A: Claims on Appeal

Appendix B: Evidence

Appendix C: Related Proceedings

APPENDIX A
CLAIMS ON APPEAL

The following is a listing of all claims, pending, withdrawn or canceled, incorporating all elements and revisions to date. All non-canceled claims are on appeal, canceled and withdrawn claims being canceled or withdrawn without prejudice or disclaimer.

1. (rejected) A method for using a topology editor to prescribe a device notified in response to an event related to the operation of a data network and said event comprising the steps of:

defining said event pertaining to said operation of a data network, wherein said operation concerns at least one of: the status of the data network or a device of said data network;

assigning a group consisting of a plurality of said devices of said data network to be notified in response to said event by use of said topology editor;

assigning a rule to said event, wherein said rule defines at least one condition for triggering a notification of said event to said assigned device, and

said condition is to be activated when matched to a notification of the operation of said data network.

2. (cancelled).

3. (rejected) The method of claim 1, wherein the topology editor controls an Simple Network Management Protocol manager that transmits a Simple Network Management Protocol trap in response to an activated rule.
4. (cancelled).
5. (rejected) The method of claim 1, wherein an event group is defined for assigning a second device to said event by using said topology editor.
6. (rejected) The method of claim 5, wherein said device and said second device of said event group are notified with an action provider when said condition is matched to said notification.
7. (rejected) The method of claim 6, wherein said notification is rendered in view of a severity option.
8. (rejected) A method for using a topology editor to notify a group of devices in response to an event related to the operation of a data network comprising the steps of:
 - receiving a notification related to the operation of the data network, wherein said operation is related to a status of the data network or a device of the data network;
 - comparing said notification to a condition of a rule;
 - notifying a defined group of devices in response to said event with an action provider, wherein said notification of said defined group of devices in response to said event is defined by use of said topology editor.

9. (cancelled).

10. (rejected) The method of claim 8, wherein said topology editor controls an Simple Network Management Protocol manager that transmits Simple Network Management Protocol trap in response to an activated rule.

11. (rejected) The method of claim 8, wherein an event group is defined for assigning a second device to said event by using said topology editor.

12. (rejected) The method of claim 11, wherein the devices of said event group are notified with the action provider upon the matching of said condition of said rule to said notification.

13. (rejected) The method of claim 8, wherein said topology editor operates with in view of a consumer electronics enabled interoperability standard.

14. (rejected) The method of claim 8, wherein said topology editor is used to control an action manager for controlling the operation of said device in view of a second action provider.

15. (withdrawn).

16. (withdrawn).

APPENDIX B

EVIDENCE

None.

APPENDIX C
RELATED PROCEEDINGS

None